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Attorneys for Defendant
RENAISSANCE LEARNING, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION - SANTA ANA

NICOLE REISBERG, on behalf of her
minor children M.C. 1 and M.C. 2,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

RENAISSANCE LEARNING, INC.,

Defendant.

Case No. 8:25-cv-01379-FWS-JDE

**DEFENDANT'S NOTICE OF MOTION
AND MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

Date: December 11, 2025
Time: 10:00 a.m.
Courtroom: 10D

Pretrial Conference: Not Yet Set
Trial Date: Not Yet Set

1 TO PLAINTIFF AND HER ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on Thursday, December 11, 2025 at 10:00 a.m.,
3 in Courtroom 10D of the U.S. Courthouse located at 411 West 4th Street in Santa
4 Ana, California 92701, Defendant Renaissance Learning, Inc. (“Renaissance”) will
5 and hereby does move the Court, pursuant to Federal Rule of Civil Procedure
6 12(b)(6), to dismiss Plaintiff’s Complaint without leave to amend. For the reasons
7 set forth in the accompanying Memorandum of Points and Authorities, Plaintiff fails
8 to state any claim upon which relief can be granted, such that dismissal in full of her
9 Complaint is appropriate.

10 This motion is based upon this Notice, the accompanying Memorandum of
11 Points and Authorities, the concurrently filed declaration of Bethany Lobo, the
12 pleadings and papers on file in this action, and any further evidence or argument of
13 counsel that the Court may receive at or before the hearing.

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15 Dated: September 4, 2025

COOLEY LLP

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17 By: /s/ Matthew D. Brown
18 Matthew D. Brown

19 Attorneys for Defendant
20 RENAISSANCE LEARNING, INC.
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